1

2

3

4

Fax:

5

6

7

8

10

11 12

13

15

14

16

17

18 19

20

2122

23

24

25



2020 FEB 19 PMII: 07 P

Burna TinadaLITY, CLENK

T. MAINEZ

## IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF YAVAPAI

STATE OF ARIZONA., Case No.:

Plaintiff,

VS.

MICHAEL LEE HAM,

J. Andrew Jolley, # 025560

116 N. Summit Avenue Prescott, Arizona 86301

Phone: (928) 445-1909

Email: andy@plgnaz.com Attorney for Defendant

(928) 350-8839

PRESCOTT LAW GROUP, PLC

Defendant.

Case No.: P1300CR201901558

MOTION TO PERMIT TRAVEL

(EXPEDITED)

COMES NOW Defendant, Michael Lee Ham, by and through counsel undersigned, who respectfully requests the Court permit Defendant to travel to the state of Colorado. Said motion is based on the desire of Defendant to visit his brother and close friend in the state of Colorado. The specifics of the intended trip are as follows:

- Defendant would depart Arizona on February 26, 2020 and return on March 3rd or 4th, 2020.
- 2. During this trip Defendant would be staying at the home of Mark Ham, his brother in Centennial, Colorado, and/or the home of Charles Ritz, defendant's friend in Denver, Colorado. His travel will be limited to the Greater Denver area, including Denver and Summit Counties. The full addresses of both the above residences have been provided to undersigned counsel and can be provided to the Court as needed for in camera review.

1 Undersigned counsel's office has contacted counsel for the State of Arizona through 2 Brett Harames and has been informed that the State has no objection to the requested permission 3 to travel to Colorado as set forth herein. 4 Additionally, undersigned counsel will have the ability to contact the Defendant as 5 needed. 6 WHEREFORE, Defendant requests that the Court grant him permission to travel to 7 the State of Colorado for the period of February 26, 2020 through March 4, 2020. 8 RESPECTFULLY SUBMITTED this 1/2 Day of February, 2020. 9 Prescott Law Group, PLC 10 11 J. Andrew Jolley Esq. 12 Original of the foregoing filed on this 1 day of February, 2020, with: 13 14 Clerk of the Superior Court 120 S. Cortez Street 15 Prescott, Arizona 85301 16 Copies of the foregoing hand-delivered: Judge Ainley 17 Copy emailed to: 18 **Brett Harames** Assistant Attorney General 19 Brett.Harames@azag.gov 20 21 22 23 24

25